

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION II EDISON, NEW JERSEY 08837

SEP 06 1991

Mr. William Deininger
Contract Administrator
Metcalf & Eddy of New York, Inc.
303 S. Broadway, Suite 318N
Tarrytown, NY 10591

BY FACSMILE AND CERTIFIED MAIL RETURN RECEIPT

Dear Mr. Deininger:

Earlier this week I received word from my TAT contractor that he was told that Metcalf & Eddy (ME) was planning to demobe from the Nelson Galvanizing site on September 6, 1991. The reason being that it was opined to TAT that the 'job was done'.

I spoke with you and expressed some reservations that the job was indeed not yet done, and I visited the site today to ascertain the extent of any remaining work in conjunction with the removal action. I observed the following items that I feel need to be addressed:

- 1. Drums of acidic liquids (pH ≈ 3) still scattered about,
- 2. Drums of previously excavated soil still on-site,
- 3. Drums and bins of C & D waste still on-site,
- 4. Piles of ferrous sulfate crystals on the dirt floor between the poly acid tanks,
- 5. Hundreds of steel and poly 55-gallon drums on-site,
- 6. Approx. 8 55-gallon drums of dross and zinc flux remain on-site,
- 7. New puddles of acidic liquids on the floor adjacent to the large poly acid tank,
- 8. Steam line condensate leaks must be repaired to preclude additional accumulation of acidic liquids on the floor,
- 9. Fiberglass siding not installed,

Based on what I saw, I believe that although large amounts of waste have been removed, there remains a considerable amount of material and repairs.

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Although I cannot direct M & E to remain on-site, I have expressed my views to John Sweeney, and I urge you to discuss this situation with him also. It is the position of EPA that the removal action may be undertaken by Nelson Galvanizing Inc. only with qualified personnel, and this position is clearly stated in Paragraph 34 of the consent order. As such, the remaining work cannot be done by Nelson Galvanizing Inc. employees.

If there is a question of available funding for continued presence of ME at the site, please advise me and EPA will notify Mr. Sweeney to deposit additional monies in the escrow account.

Please let me know whether ME will remain on-site to address the above mentioned items.

Sincerely yours,

Paul L. Kahn

On-Scene Coordinator

Response and Prevention Branch

cc: M. Mintzer, 20RC

J. Sweeney, NGI